

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

IN THE MATTER OF:

AMP, Inc.)	
1175 N. Main Street)	Docket No. RCRA-III-232
Harrisonburg, Virginia 22801)	CONSENT ORDER
Respondent)	

The Preliminary Statement, Findings of Fact and Conclusions of Law, Compliance Tasks and Penalty in the foregoing Consent Agreement are accepted by the undersigned and incorporated as if set forth at length herein;

NOW THEREFORE, pursuant to Section 3008 of the Resource Conservation and Recovery Act, 42 U.S.C. Section 6928, and 40 C.F.R. Section 22.18(c), AMP, Inc. is ordered to comply with the terms and conditions of the Consent Agreement, including but not limited to the Compliance Tasks, and to pay a civil penalty of \$18,650. Payment of the civil penalty shall be made within thirty (30) calendar days of Respondent's receipt of this Consent Order. Payment shall be made by cashier's or certified check payable to the Treasurer, United States of America. Remittance shall be sent to the United States Environmental Protection Agency (EPA), Region III, Regional Hearing Clerk, P.O. Box 360515, Pittsburgh, Pennsylvania 15251-6515. A copy of the check shall be sent simultaneously to the Regional Hearing Clerk (3RC00), EPA, Region III, 841 Chestnut Building, Philadelphia, Pennsylvania 19107.

The Respondent's failure to make timely payment or to comply with the conditions in this Consent Order may result in referral of this matter to the United States Attorney for enforcement of the Consent Agreement and Consent Order in the appropriate United

States District Court.

The following notice concerns interest and late payment penalty charges that will accrue if the civil penalty set forth above is not paid according to the date stated above.

Pursuant to 31 U.S.C. Section 3717, an executive agency is entitled to assess interest and penalties on debts owed to the United States, and a charge to cover the cost of processing and handling a delinquent claim. Interest will begin to accrue on a civil penalty if it is not paid by the date stated above. 4 C.F.R. Section 102.13(b). Interest will be assessed at the rate of the United States Treasury Tax and Loan Rate. 4 C.F.R. Section 102.13(c). In addition, a penalty charge of six percent per year will be assessed on any portion of the debt which remains delinquent more than ninety (90) days after payment is due. However, should assessment of the penalty charge on the debt be required, it will be assessed as of the first day payment is due. 4 C.F.R. Section 102.13(e).

This Consent Order is effective upon receipt by Respondent.

Date: _____

Edwin B. Erickson
Regional Administrator

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

IN THE MATTER OF:

AMP, Inc.)	
1175 N. Main Street)	Docket No. RCRA-III-232
Harrisonburg, Virginia 22801)	CONSENT AGREEMENT
Respondent)	

Preliminary Statement

1. This Consent Agreement is entered into by the U.S. Environmental Protection Agency, Region III ("Complainant") and AMP, Inc. ("Respondent") pursuant to Section 3008(a) and (g) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. Section 6928(a) and (g), to address the violations alleged in the Complaint, Compliance Order and Notice of Opportunity for Hearing ("Complaint") issued to AMP, Inc. on September 30, 1991.

2. Respondent filed an Answer, dated November 1, 1991, responding to the Complaint.

3. Respondent in its Answer, dated November 1, 1991, admitted that it owns and operates AMP, Inc. located at 1175 N. Main Street, Harrisonburg, Virginia.

4. For the purposes of this proceeding only, Respondent admits the jurisdictional allegations of the Complaint. Respondent agrees not to contest EPA's jurisdiction with respect to this Consent Agreement and the attached Consent Order or the enforcement thereof.

5. Respondent neither admits nor denies the allegations of fact or law contained in the Complaint or herein.

6. For the purposes of this proceeding only, Respondent hereby expressly waives its right to a hearing on any issue of law or fact set forth in the Complaint or herein.

7. Respondent consents to the issuance of this Consent Agreement and the Consent Order and agrees to comply with their respective terms.

8. Respondent shall bear its own costs and attorney's fees.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

9. The Findings of Fact and Conclusions of Law set forth in the Complaint (excepting paragraphs 12, 14, 16, 17, and 23 through 26), and in Paragraph 3 of this Consent Agreement are hereby incorporated into this Consent Agreement as if set forth fully herein subject to the provisions of Paragraphs 4 and 5 above.

10. Respondent is a corporation doing business in the Commonwealth of Virginia and is a "person" as defined in Section 2.134 of the Virginia Hazardous Waste Management Regulations (VHWMR) (40 C.F.R. Section 260.10).

COMPLIANCE TASKS

11. Respondent shall achieve and thereafter maintain compliance with the following compliance tasks within the time periods specified below:

a) Immediately achieve and thereafter maintain compliance with the following Land Disposal Restriction ("LDR") regulations of RCRA, 40 C.F.R. Part 268, including but not limited to:

- 1) the notification and certification requirements of 40 C.F.R. § 268.7(a)(1) and/or (a)(2);
- 2) the record keeping requirements of 40 C.F.R. § 268.7(a)(6); and
- 3) the prohibitions on storage of restricted wastes in accordance with 40 C.F.R. § 268.50(a).

12. Waste Minimization: Within one year of the effective date of this Consent Agreement, Respondent will implement and report to EPA Region III on the following waste minimization projects which have been designed to reduce, minimize and eliminate wastes:

- a. Installation of an improved rinse system to reduce drag-out of chemicals from the plating process, which will reduce the amount of metal hydroxide sludge generated;
- b. Installation of a recycling system to reprocess spent alkaline cleaner, which is expected to reduce the generation of metal

hydroxide sludge; and

c. Installation of plate-out cells to minimize the generation of waste metals contained in the metal hydroxide sludge.

OTHER APPLICABLE LAWS

13. Nothing in this Consent Agreement and Consent Order shall relieve Respondent of any duties otherwise imposed upon it by applicable federal, state or local laws and/or regulations.

PENALTY

14. Respondent agrees to pay the amount of \$18,650, which EPA hereby agrees and acknowledges shall be in full and final satisfaction of: (a) the claims for civil penalties based upon the violations alleged in the Complaint; and (b) any claims for civil penalties for additional days of the violations set forth in the Complaint which EPA could have brought prior to the execution of this Consent Agreement and Consent Order by EPA.

15. Payment of the penalty required under the terms of paragraph 14, above, shall be made by sending a cashier's or certified check payable to the Treasurer, United States of America, EPA Region III, Regional Hearing Clerk, P.O. Box 360515, Pittsburgh, Pennsylvania 15251-6515. A copy of such check shall be sent simultaneously to the Regional Hearing Clerk (3RC00), EPA Region

III, 841 Chestnut Building, Philadelphia, Pennsylvania 19107.

PARTIES BOUND

16. This Consent Agreement and the attached Consent Order shall apply to and be binding upon the parties hereto, their officers, directors, employees, agents, successors, and assigns and upon all persons, independent contractors, contractors, and consultants acting under or for the parties hereto.

EFFECTIVE DATE

17. This Consent Agreement and the attached Consent Order shall become effective upon receipt by the Respondent of true and correct copies of the fully executed Consent Agreement and Consent Order.

For Respondent:

AMP Inc., Harrisonburg, Virginia

Date: _____

By: _____

Name: _____

Title: _____

For Complainant:

U.S. Environmental Protection Agency,
Region III

Date: _____

By: _____
Cheryl L. Jamieson
Assistant Regional Counsel

After reviewing the Findings of Fact, Conclusions of Law, and other pertinent matters, I recommend that the amount of the proposed penalty be reduced from \$60,650 to \$18,650. Accordingly, the Hazardous Waste Management Division, EPA, Region III, recommends that the Regional Administrator issue the Consent Order attached hereto.

Date: _____

By: _____
Bruce Smith, Associate Division
Director for RCRA Programs
Hazardous Waste Management
Division

APRIL 1990

CHECKLIST FOR HAZARDOUS WASTE
INSPECTION OF GENERATORS

Name of Facility: AMP Inc

Address: 1175 N. Main St.

Harrisonburg, VA 22801

EPA ID Number: VAD09844474

Facility Representative: John A. Rehm

Title: Plant Manager

Telephone Number (703) 433-3200

Inspector's Name: Cheryl Finley

Title: Environmental Engineer Sr.

Date of Inspection: November 28, 1990

Va. Hazardous Generator Checklist
Waste Reg.

6.3. 1. Is a manifest system currently being used for all hazardous waste shipped off site? ☒ YES NO

6.2.C. 2. Has the generator determined that the transporter(s) and facility have an EPA ID number? [Note: Shipments to POTWs must be manifested and the POTW must meet all permit-by-rule requirements of VHWMR Section 11.8.B.] ☒ YES NO

5.5.A.7 3. Has the generator determined that the transporter has a valid EPA Identification number and a valid Virginia Transporter Permit? ☒ YES NO

6.3 4. Is the following information on the
5.3.B.1. manifest:

- a. The generator's name, mailing address, EPA ID Number, and telephone number? ☒ YES ☐ NO
- 5.3.B.2. b. A unique five digit number assigned to this manifest by the generator? YES ☒ NO ✓
- 5.3.B.3. c. The total number of pages of the manifest? ☒ YES ☐ NO
- 5.3.B.4. d. The company name and EPA ID number of each transporter used? ☒ YES ☐ NO
- 5.3.B.5. e. The company name, site address, and EPA ID number of the facility designated to receive the waste? ☒ YES ☐ NO
- 5.3.B.6. f. The U. S. DOT description of each waste to include its proper shipping name, hazard class, and I.D. number (UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material? ☒ YES ☐ NO
- 5.3.B.7. g. The quantities of waste being shipped? ☒ YES ☐ NO
- 5.3.C. h. The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment." ☒ YES ☐ NO

- 6.5.C.2. 5. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago? ☒ YES NO
- If no, has the generator filed an exception report with the Executive Director which included: YES NO
N/A
- 6.5.C.2.a. a. A legible copy of the manifest for which the generator does not have confirmation of the delivery; and YES NO
N/A
- 6.5.C.2.b. b. A cover letter explaining the efforts taken to locate the shipment? YES NO
N/A
- 6.4.E.1. 6. Is hazardous waste being accumulated on-site for less than 90 days? If yes, YES ☒ NO ✓
- 6.4.E.1.a. a. Is the waste stored in containers? ☒ YES NO
In tanks? YES ☒ NO
(If answer to either question is yes, fill out appropriate checklists. If both answers are no, interim status or a TSD permit is required - fill out facility checklist to determine compliance status).
- 6.4.E.1.b. b. Is the date that accumulation begins clearly marked and visible for inspection on each container? YES ☒ NO ✓
- 6.4.E.1.c. c. Is each container and tank clearly marked with the words "Hazardous Waste"? YES ☒ NO ✓
- 6.4.E.1.e. d. Has the generator notified the Executive Director by March 1, 1988, of the exact location of the existing accumulation areas, and at least 15 days prior to use for subsequently established accumulation areas? YES ☒ NO ✓
- 6.4.E.2. 7. Does the generator accumulate (store) hazardous waste on-site for greater than 90 days? If yes, interim status or a TSD permit is required - fill out facility checklist to determine compliance status. ☒ YES NO
- 6.4.E.1.d. 8. Does the generator record inspections ☒ YES NO

- 9.1.F.4. in an inspection log?
- 6.4.E.1.d. 9.1.G.1. 9. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? ☒ YES NO
- 9.1.G.2. 10. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility? ☒ YES NO *have 1 employee working 2 months - not yet trained*
- 9.1.G.3. 11. Do personnel participate in an annual review of the initial training? YES ☒ NO ✓
12. Does the facility maintain a record of the following:
- 9.1.G.4.a. a. job titles for each position at the facility related to hazardous waste management; and YES ☒ NO ✓
- 9.1.G.4.a. b. the name of the employee filling each job; and YES ☒ NO ✓
- 9.1.G.4.b c. a written job description for each position in (a); and YES ☒ NO ✓
- 9.1.G.4.c. d. a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in (a); and YES ☒ NO ✓
- 9.1.G.4.d. e. Records that document that the training or job experience required above has been given to, and completed by facility personnel? YES ☒ NO ✓
- 9.2.B. 9.2.D. 13. At the facility, is the following equipment installed:

- 9.2.B.1. a. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste generation or accumulation areas are threatened by hazardous waste release, fire or explosion? ☒ YES NO
- 9.2.B.2. b. A device (at the scene of hazardous waste generator operations) capable of summoning emergency assistance from Police, Fire Departments, etc.? ☒ YES NO
- 9.2.B.3. c. Portable fire extinguishers, fire control, and decontamination equipment?; and ☒ YES NO
- 9.2.B.4. d. Water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system? ☒ YES NO
- 9.2.C. 14. Is a record of tests and inspections of items 13 a-d maintained at the facility? ☒ YES NO
- 9.2.E. 15. Does the facility have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies? YES ☒ NO ✓
- 6.4.E.1.d. 16. Does the facility have an established contingency plan to deal with any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, ground water or surface water? ☒ YES NO
- 9.3. 9.3.B. 17. Does the contingency plan contain the following elements:

*does not include emergency notification to Executive Director
- says to call Corporate Environmental in Harrisburg + DES,*

9.3.B.(1,2).

a. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, and water?

(YES) NO

9.3.B.3.

b. A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors and Commonwealth and local emergency response teams to coordinate emergency services, as required?

YES (NO) ✓

9.3.B.4.

c. A listing of names, addresses, and office and home phone numbers of all persons qualified to act as emergency coordinator? List primary Coordinator.

YES (NO) ✓
no home addresses

Name John Rehm

Title Plant Manager

Telephone (703) 433-3200

9.3.B.5.

d. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility?

(YES) NO

9.3.B.6.

e. Does this list specify the location and physical description of each item on the list and a brief outline of its capabilities?

YES (NO) ✓

9.3.B.6.

f. An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary?

(YES) NO

9.3.C.

g. Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams?
List:

YES (NO) ✓

Rockingham Hospital

Co Administrator

Virginia Dept. of Emergency Services

Harrisonburg Rescue Squad

Harrisonburg Fire Dept

Harrisonburg Police Dept

→ were not sent 11/90 revision

→ did were sent

7/26/90 revision

9.3.C.	h. Is there documentation to indicate the personnel listed above received the contingency plan?	YES	(NO) ✓ (only Police dept - confirmed receipt.)
9.3.F.(9,10).	i. Has the contingency plan ever been implemented?	YES	(NO)
	If <u>yes</u> , was a written report filed with the Executive Director and were the Executive Director and other required authorities properly notified before operations resumed?	YES	NO N/A
6.4.E.3.a.	18. Does the generator have satellite accumulation areas? If <u>yes</u> ,	YES	(NO)
	a. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate?	YES	NO N/A
6.4.E.3.a.(1) 9.8.B.	b. Are the containers in good condition?	YES	NO N/A
6.4.E.3.a.(1) 9.8.C.	c. Are the containers compatible with the waste?	YES	NO N/A
6.4.E.3.a.(1) 9.8.D.1.	d. Are the containers kept closed except as necessary to add or remove waste?	YES	NO N/A
6.4.E.3.a.(2)	e. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?	YES	NO N/A
6.5.E.3.b.	f. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If <u>yes</u> ,	YES	NO N/A
	(1) Has the generator marked the excess amount with the date the excess amount began accumulating?	YES	NO N/A
	(2) Has the generator either removed the excess amount within three days of the date of excess accumulations or has he complied with all other provisions for accumulation areas listed in question 5 on this checklist? Namely, has he notified the	YES	NO N/A

Executive Director about the location of the accumulation area?

If no, what has the generator chosen to do? _____

6.5.A.

19. Does the generator retain copies of all manifests, annual reports, and test results for at least three years? ☒ YES NO

6.5.B.

20. Has the facility submitted an annual report for the preceding calendar year? ☒ YES NO

21. Comments: _____

APRIL 1990

CHECKLIST FOR HAZARDOUS WASTE
INSPECTION OF GENERATORS

Name of Facility: AMP Inc

Address: 1175 N. Main St.

Harrisonburg, VA 22801

EPA ID Number: VAD098444474

Facility Representative: John A. Rehm

Title: Plant Manager

Telephone Number (703) 433-3200

Inspector's Name: Cheryl Finley

Title: Environmental Engineer Sr.

Date of Inspection: November 28, 1990

Va. Hazardous Generator Checklist
Waste Reg.

- 6.3. 1. Is a manifest system currently being used for all hazardous waste shipped off site? ☒ YES NO
- 6.2.C. 2. Has the generator determined that the transporter(s) and facility have an EPA ID number? [Note: Shipments to POTWs must be manifested and the POTW must meet all permit-by-rule requirements of VHWMR Section 11.8.B.] ☒ YES NO
- 5.5.A.7 3. Has the generator determined that the transporter has a valid EPA Identification number and a valid Virginia Transporter Permit? ☒ YES NO
- 6.3 4. Is the following information on the
5.3.B.1. manifest:

- a. The generator's name, mailing address, EPA ID Number, and telephone number? ☒ YES ☐ NO
- 5.3.B.2. b. A unique five digit number assigned to this manifest by the generator? YES ☒ NO ✓
- 5.3.B.3. c. The total number of pages of the manifest? ☒ YES ☐ NO
- 5.3.B.4. d. The company name and EPA ID number of each transporter used? ☒ YES ☐ NO
- 5.3.B.5. e. The company name, site address, and EPA ID number of the facility designated to receive the waste? ☒ YES ☐ NO
- 5.3.B.6. f. The U. S. DOT description of each waste to include its proper shipping name, hazard class, and I.D. number (UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material? ☒ YES ☐ NO
- 5.3.B.7. g. The quantities of waste being shipped? ☒ YES ☐ NO
- 5.3.C. h. The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment." ☒ YES ☐ NO

- 6.5.C.2. 5. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago? ☒ YES NO
- If no, has the generator filed an exception report with the Executive Director which included: YES NO
N/A
- 6.5.C.2.a. a. A legible copy of the manifest for which the generator does not have confirmation of the delivery; and YES NO
N/A
- 6.5.C.2.b. b. A cover letter explaining the efforts taken to locate the shipment? YES NO
N/A
- 6.4.E.1. 6. Is hazardous waste being accumulated on-site for less than 90 days? If yes, YES ☒ NO ✓
- 6.4.E.1.a. a. Is the waste stored in containers? ☒ YES ☒ NO
In tanks? YES ☒ NO
(If answer to either question is yes, fill out appropriate checklists. If both answers are no, interim status or a TSD permit is required - fill out facility checklist to determine compliance status).
- 6.4.E.1.b. b. Is the date that accumulation begins clearly marked and visible for inspection on each container? YES ☒ NO ✓
- 6.4.E.1.c. c. Is each container and tank clearly marked with the words "Hazardous Waste"? YES ☒ NO ✓
- 6.4.E.1.e. d. Has the generator notified the Executive Director by March 1, 1988, of the exact location of the existing accumulation areas, and at least 15 days prior to use for subsequently established accumulation areas? YES ☒ NO ✓
- 6.4.E.2. 7. Does the generator accumulate (store) hazardous waste on-site for greater than 90 days? If yes, interim status or a TSD permit is required - fill out facility checklist to determine compliance status. ☒ YES NO
- 6.4.E.1.d. 8. Does the generator record inspections ☒ YES NO

9.1.F.4. in an inspection log?

6.4.E.1.d. 9. Have facility personnel successfully ☒ YES NO
9.1.G.1. completed a program of classroom training
or on-the-job training in hazardous waste
management procedures?

9.1.G.2. 10. Have new employees to the facility ☒ YES NO
successfully completed training mentioned
above within 6 months of their employment
or assignment to the facility? *have 1 employee working
2 months - not yet trained*

9.1.G.3. 11. Do personnel participate in an annual YES ☒ NO ✓
review of the initial training?

12. Does the facility maintain a record
of the following:

9.1.G.4.a. a. job titles for each position at the YES ☒ NO ✓
facility related to hazardous waste
management; and

9.1.G.4.a. b. the name of the employee filling YES ☒ NO ✓
each job; and

9.1.G.4.b c. a written job description for each YES ☒ NO ✓
position in (a); and

9.1.G.4.c. d. a written description of the type YES ☒ NO ✓
and amount of both introductory and
continuing training that will be given
to each person filling a position
listed in (a); and

9.1.G.4.d. e. Records that document that the YES ☒ NO ✓
training or job experience required
above has been given to, and completed
by facility personnel?

9.2.B. 13. At the facility, is the following
9.2.D. equipment installed:

- 9.2.B.1. a. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste generation or accumulation areas are threatened by hazardous waste release, fire or explosion? ☒ YES NO
- 9.2.B.2. b. A device (at the scene of hazardous waste generator operations) capable of summoning emergency assistance from Police, Fire Departments, etc.? ☒ YES NO
- 9.2.B.3. c. Portable fire extinguishers, fire control, and decontamination equipment?; and ☒ YES NO
- 9.2.B.4. d. Water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system? ☒ YES NO
- 9.2.C. 14. Is a record of tests and inspections of items 13 a-d maintained at the facility? ☒ YES NO
- 9.2.E. 15. Does the facility have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies? YES ☒ NO ✓
- 6.4.E.1.d. 16. Does the facility have an established contingency plan to deal with any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, ground water or surface water? ☒ YES NO
- 9.3. 9.3.B. 17. Does the contingency plan contain the following elements:

*does not include emergency notification to Executive Director
- says to call Corporate Environmental in Harrisburg - D&S,*

9.3.B.(1,2).

a. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, and water?

(YES) NO

9.3.B.3.

b. A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors and Commonwealth and local emergency response teams to coordinate emergency services, as required?

YES (NO) ✓

9.3.B.4.

c. A listing of names, addresses, and office and home phone numbers of all persons qualified to act as emergency coordinator? List primary Coordinator.

YES (NO) ✓

no home addresses

Name John Rehn

Title Plant Manager

Telephone (703) 433-3200

9.3.B.5.

d. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility?

(YES) NO

9.3.B.6.

e. Does this list specify the location and physical description of each item on the list and a brief outline of its capabilities?

YES (NO) ✓

9.3.B.6.

f. An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary?

(YES) NO

9.3.C.

g. Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? List:

YES (NO) ✓

Rockingham Hospital:

Co Administrator

Virginia Dept. of Emergency Services

Harrisonburg Rescue Squad

Harrisonburg Fire Dept

Harrisonburg Police Dept

✓ were not sent 11/90 revision

✓ did were sent

7/26/90 revision

9.3.C.	h. Is there documentation to indicate the personnel listed above received the contingency plan?	YES	<input checked="" type="radio"/> NO ✓ (only Police dept - cont'd receipt.)
9.3.F.(9,10).	i. Has the contingency plan ever been implemented?	YES	<input checked="" type="radio"/> NO
	If <u>yes</u> , was a written report filed with the Executive Director and were the Executive Director and other required authorities properly notified before operations resumed?	YES	NO N/A
6.4.E.3.a.	18. Does the generator have satellite accumulation areas? If <u>yes</u> ,	YES	<input checked="" type="radio"/> NO
	a. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate?	YES	NO N/A
6.4.E.3.a.(1) 9.8.B.	b. Are the containers in good condition?	YES	NO N/A
6.4.E.3.a.(1) 9.8.C.	c. Are the containers compatible with the waste?	YES	NO N/A
6.4.E.3.a.(1) 9.8.D.1.	d. Are the containers kept closed except as necessary to add or remove waste?	YES	NO N/A
6.4.E.3.a.(2)	e. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?	YES	NO N/A
6.5.E.3.b.	f. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If <u>yes</u> ,	YES	NO N/A
	(1) Has the generator marked the excess amount with the date the excess amount began accumulating?	YES	NO N/A
	(2) Has the generator either removed the excess amount within three days of the date of excess accumulations or has he complied with all other provisions for accumulation areas listed in question 5 on this checklist? Namely, has he notified the	YES	NO N/A

Executive Director about the location of the accumulation area?

If no, what has the generator chosen to do? _____

6.5.A.

19. Does the generator retain copies of all manifests, annual reports, and test results for at least three years? ☒ YES NO

6.5.B.

20. Has the facility submitted an annual report for the preceding calendar year? ☒ YES NO

21. Comments: _____

APRIL 1990

INSPECTION CHECKLIST FOR
THE USE AND MANAGEMENT OF CONTAINERS

Name of Facility: AMP Incorporated
Address: 1175 N. Main St.
Harrisonburg, VA 22801
EPA ID Number: VAD098444474
Facility Inspection Representative: John Rehm
Title: Plant Manager
Telephone Number: (703) 433-3200
Inspector's Name: Cheryl Finley
Title: Environmental Engineer Sr.
Date of Inspection: November 28, 1990

Va. Hazardous
Waste Reg.

9.8.B.

1. Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?

☒ YES NO

If no, list the storage/accumulation areas where there are problems and the type of problem:

Location

Problem

_____	_____
_____	_____
_____	_____
_____	_____

9.8.C.

2. Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored?

☒ YES NO

- 6.4.E.b 3. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container? YES ☒ NO ✓
- 6.4.E.c. 4. Is the container labeled or marked clearly with the words "Hazardous Waste"? ☒ YES NO
- 9.8.D.1. 5. Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste? ☒ YES NO
- If no, list the locations where open containers are found. _____

- 9.8.E. 6. Are areas where hazardous waste containers are stored inspected by the owner/operator at least weekly? YES ☒ NO ✓
- 9.1.F.2.a. 7. For large quantity generators and
9.1.F.4. TSD facilities only:
6.4.E.1.d. Is an inspection log maintained? ☒ YES NO
when inspections conducted
- 9.8.F. 8. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line? ☒ YES NO
- 9.8.G.1. 9. Are incompatible wastes placed in separate containers? ☒ YES NO
- 9.8.G.3. 10. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices? ☒ YES NO

6.4.E.3.a.

11. For satellite accumulation areas:

a. Are there more than 55 gallons of any one type of waste present in the area?

YES NO
N/A

If yes,

6.4.E.3.b

b. Has the amount in excess of 55 gallons been in the satellite accumulation area longer than 3 days?

YES NO
N/A

If yes,

6.4.E.3.b.

6.4.E.1.b.

c. Has the company notified the Department about the location of the accumulation area?

YES NO
N/A

10. Comments:

APRIL 1990

SURVEY SHEET
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

Name of Facility: AMP Incorporated
Address: 1175 N. Main St.
Harrisonburg, VA 22801
EPA ID Number: VAD098444474
Facility Representative: John Rehm
Title: Plant Manager
Telephone Number: (703) 433-3200
Inspector's Name: Cheryl Finley
Title: Environmental Engineer Sr
Date of Inspection: November 28, 1990

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.) metal plating, assembly of electronic components, ink stamping

2. Give a brief description of the waste stream(s) and hazardous waste code(s) generated by the firm.

Gold filters - F007 Denatured Ethyl Alcohol - F003 Tetrachloroethylene - F001
Waste water treatment sludge F006 (not called F007) + floor sweepings Trichloroethane - F001
Lead-Tin filters - D008 (not called F007) acid etch (D002) caustic clean (D002) Lead/Tin bath - D008/F007
Petroleum Naphtha - D001 Trichloroethylene - F001 Electroplating rinsewaters (F007)
Gold/Cyanide Bath - F007 Gold stripper - F007 formaldehyde - U122 lab packs - D005/U024 F005
D008/P115
D009

3. List the amounts of hazardous waste generated on a monthly basis (use the highest monthly total) and the greatest amount accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	max Amount Accumulated
<u>F007 (Au filters)</u>	<u>140 lb/mo</u>	<u>2062 lb</u>
<u>F006</u>	<u>3,291 lb/mo</u>	<u>12,356 lb</u>
<u>D008</u>	<u>140 lb/mo</u>	<u>773 lb</u>
<u>D001</u>	<u>200 gal/mo</u>	<u>200 gal</u>
<u>F001 (1,1,1 trichloroethane)</u>	<u>338 lb/mo</u>	<u>2,364 lb</u>
<u>F001 (treon)</u>	<u>492 lb/mo</u>	<u>1,600 lb</u>
<u>D002 (caustic)</u>	<u>240 gal/mo</u>	<u>0 - to WWT</u>
<u>D002 (acid)</u>	<u>60 gal/mo</u>	<u>0 - to WWT</u>
<u>F007 (stripper)</u>	<u>1050 lb/mo</u>	<u>1050 lb</u>
<u>formaldehyde</u>	<u>130,000 gal/mo</u>	

waste
Lead/Tin or
Gold/Cyanide bath
is generated

Code
0122
FO00 (sweepings)

Amt. Generated
55 gallons
4/30/16/mo

Amt. Accumulated
55 gal
4/30/16

4. Does the facility ever generate greater than:
1 kg. of acutely toxic waste (P listed waste or ☒ YES ☐ NO
F020-F023 and F026-F027)? 20 lb P115 - use unknown lab pack

100 kg of clean-up from a spill of P listed waste YES ☒ NO
or F020-F023 and F026-F027 waste?

If yes, then the facility is a generator.

5. How is the waste presently being handled? Where is it sent?

FO06 to WRE, FO07 to Leo Renal, Vanguard, or ACR, DO08 to Chem-Clear,
or Clean Harbor - also a lab pack to GSX, DO01 to Marisol, GSX, Safety-Kleen
FO01 to Safety-Kleen, GSX, Marisol, DO05/DO07, DO08/P115, DO09 to GSX

6. Does the facility generate any hazardous waste ☒ YES ☐ NO
that is excluded from regulation? If yes, list the
waste and the basis for exclusion.

7. Does the facility generate any hazardous waste ☒ YES ☐ NO
that is burned for energy recovery (hazardous waste
fuel)? If yes, list the waste, where it is sent, and
complete the Recyclable Materials Checklist.

Ethyl Alco Eth Acetate - new process - not yet disposed of - burning has
been proposed - not yet done.

8. Does the facility generate any used oil that ☒ YES ☐ NO
is burned for energy recovery (used oil fuel),
including used oil that is also a characteristic
hazardous waste, or used oil that is mixed with
hazardous waste generated by a conditionally exempt
Small Quantity Generator? If yes, list the waste, where
it is sent, and complete the Recyclable Materials Checklist.

hydraulic oil to Safety-Kleen

9. Does the facility generate any hazardous waste ☒ YES ☐ NO that is reclaimed to recover economically feasible amounts of gold^{various}, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? If yes, list the waste, where it is sent, and complete the Recyclable Materials Checklist.

sold filter - bath

10. Does the facility generate, transport or collect spent lead-acid batteries? If yes, complete the Recyclable Materials Checklist. YES ☒ NO

11. Based on the above, the facility is a:

- a. conditionally exempt small quantity generator
- b. small quantity generator
- ☒ c. generator
- d. permitted or interim status TSD
- ☒ e. unpermitted TSD (explain in comments section)

[Circle One]

12. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate indefinitely, but if the amount accumulated ever exceeds 1000 kgs. then he becomes a small quantity generator. At the time the 1000 kg. limit is passed, the accumulation times for small quantity generators begins.

Small quantity generators can accumulate up to 180 days or 270 days if the disposal site is over 200 miles away. However, if at any time over 6000 kgs. of waste is accumulated, then the small quantity generator becomes a generator.

13. List each container and tank accumulation area. Specify the number and capacity of each tank. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that site.]

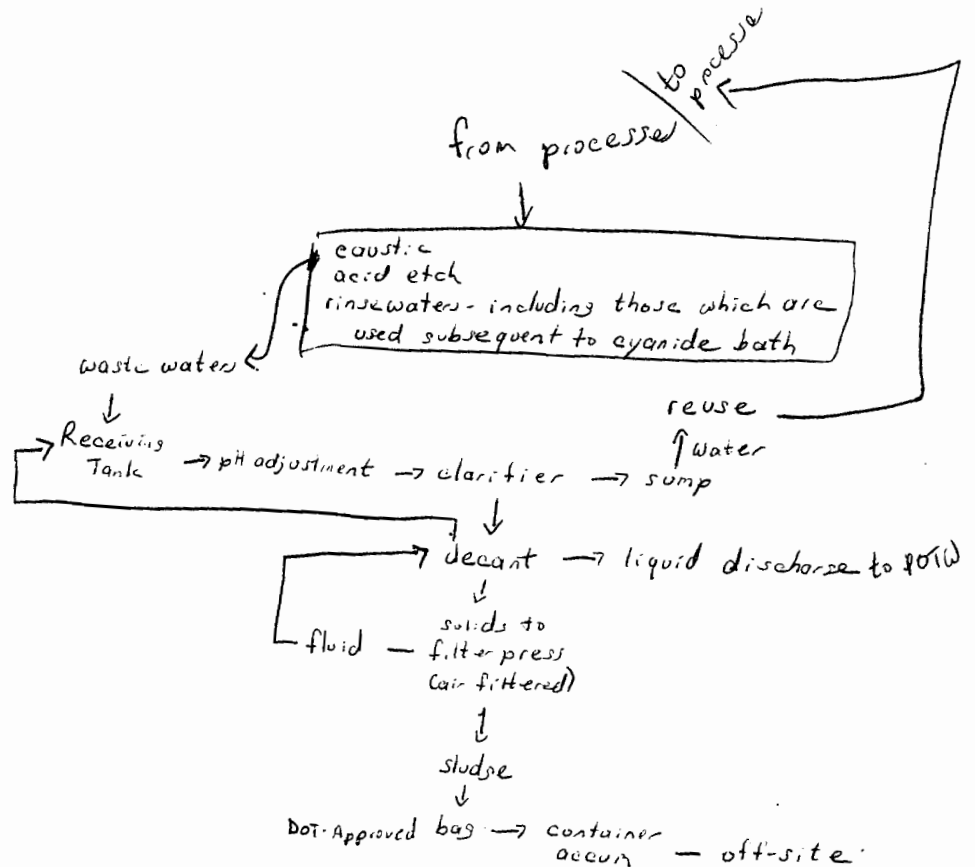
Location	Number of Containers	Number of Tanks	Capacity
filter storage (inside fence)	3	0	55 gal @
" (outside fence)	2	0	55 gal @
acid/raw mat storage	2	0	55 gal @
flame liq. stor	7	0	55 gal @
WWT	5	0	1 ton @
caustic	5	0	55 gal @

14. Comments

Greater than 90-day storage confirmed by 1989 annual report, inspection log, waste on-site during the inspection, inventory logs & implied by manifests.

15. Flow Diagrams

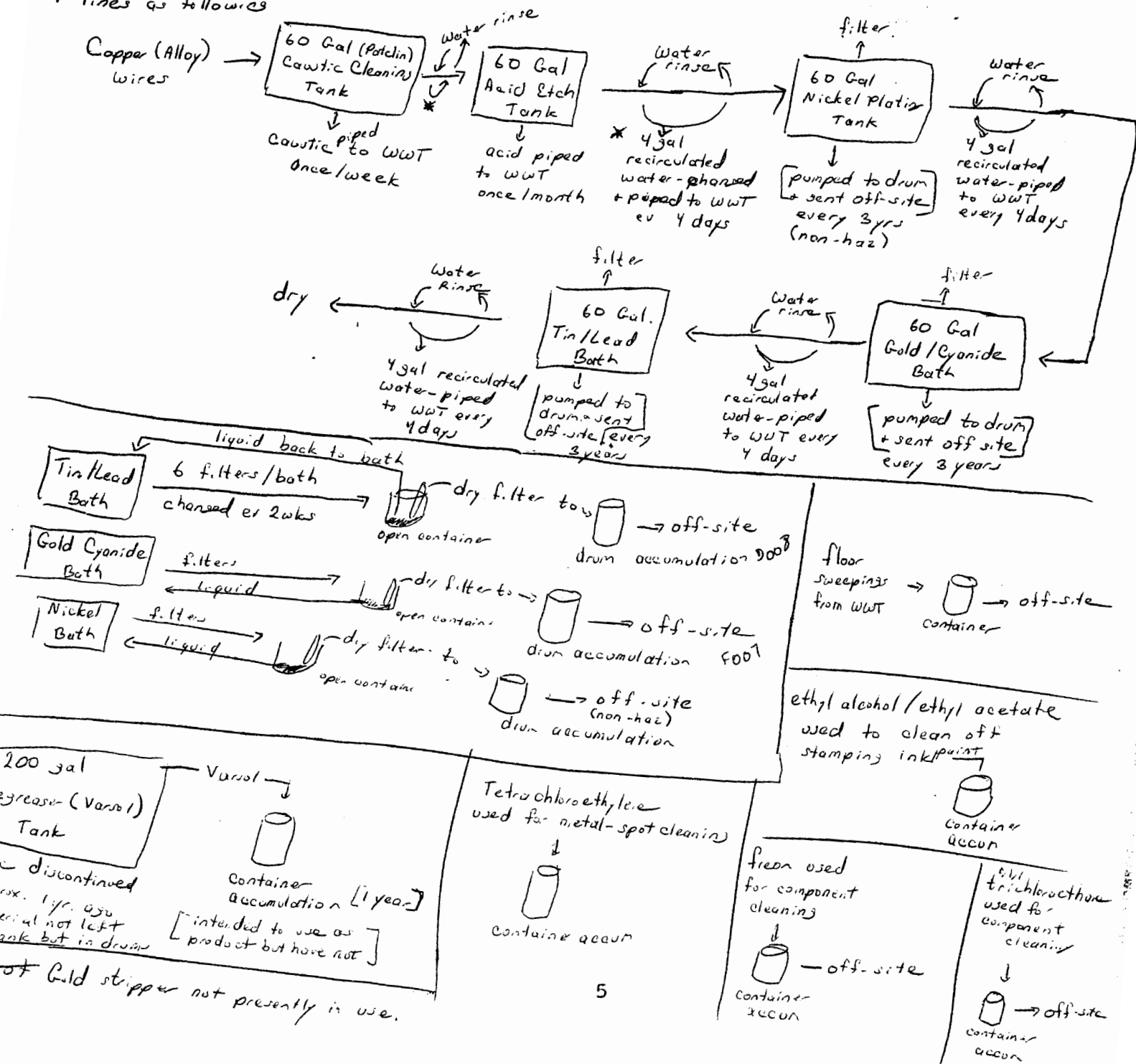
WWT



15. Waste Management Flow Diagram

(On this page sketch a brief, but detailed, flow diagram that includes where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

7 lines as follows



APRIL 1990

CHECKLIST FOR RCRA INSPECTION OF RECYCLABLE MATERIALS
(USED OIL, HAZARDOUS WASTE FUEL, AND PRECIOUS METALS)

Name of Facility: AMP Incorporated
Address: 1175 N. Main St.
Harrisonburg VA 22801
EPA ID Number: VAD098444474
Facility Representative: John Rehm
Title: Plant Manager
Telephone Number: (703) 433-3200
Inspector Name: Cheryl Finley
Title: Environmental Engineer Sr.
Date of Inspection: November 28, 1990

VHWMR Ref.

13.3.A.1. 1. Does the facility generate, transport, market or recycle hazardous wastes that are burned for energy recovery (hazardous waste fuel) in any boiler or industrial furnace that is not regulated as an incinerator? YES ☒ NO
Identify: _____

13.4.A.1 2. Does the facility generate, market or recycle used oil that is burned for energy recovery (used oil fuel) in any boiler or industrial furnace that is not regulated as an incinerator except used oil mixed with hazardous wastes? Identify: hydraulic oil to S-K fuel blending YES ☒ NO

(Note: Used oil burned for energy recovery is regulated as used oil fuel rather than hazardous waste fuel if it is a hazardous waste solely because it exhibits a characteristic of hazardous waste and is not mixed with a hazardous waste, or if it

contains hazardous waste generated by a conditionally exempt SQG, or if it exceeds the following maximum levels of hazardous constituents (off-specification used oil fuel):

Arsenic	5 ppm
Cadmium	2 ppm
Chromium	10 ppm
Lead	100 ppm
Flash point	100 F minimum
Total Halogens	4000 ppm *

* Used oil which contains greater than 1000 ppm total halogens is assumed to contain halogenated hazardous waste and therefore be regulated as hazardous waste fuel unless the company has shown that the used oil does not contain hazardous waste. For those wastes shown not to contain hazardous waste, the maximum allowable total halogen level is 4000 ppm.)

13.5.A
13.5.B

3. Does the facility generate, transport or store recyclable materials that are reclaimed to recover economically significant amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? ..

YES NO

13.6.B.

4. Does the facility store spent batteries before reclaiming them? [Note: Persons who generate, transport, or collect spent batteries, or who store spent batteries but don not reclaim them are not subject to VHWMR Parts IV through XIII.]

YES NO

For facilities who answered "Yes" to question 1, complete questions 5 through 10:

5. Does the facility:

a) generate b) transport c) market d) burn

hazardous waste fuel? (circle one) NO

[Note: If facility is a transporter, complete transporter checklist.]

6. For marketers of hazardous waste fuel:

a. For marketers who make the claim that the waste is legitimate hazardous waste fuel, how is this done? _____

Identify each waste stream (if more than one stream is mixed together, identify each stream separately): _____

BTU value of each stream: _____

7. For marketers of hazardous waste fuel:

13.3.B.1.a
13.3.E.2

a. Does the person market hazardous waste fuel only to those persons who have completed a Notification of Hazardous Waste Activity and received an EPA Identification Number, and who burn the fuel in boilers or industrial furnaces as defined in VHWMR Part I?

YES NO

N/A

13.3.E.3.

b. Are the provisions of VHWMR Sections 6.4.E, 9. through 9.11., 10. through 10.11. and Part XI being adhered to?

YES NO

N/A

13.3.E.5.a

c. For marketers who ship hazardous waste fuel to a burner or another marketer, has the marketer first obtained a one time written and signed notice from the burner or marketer certifying that the burner or marketer has completed a Notification of Hazardous Waste Activity, and if the recipient is a burner, that the hazardous waste fuel will be burned in a boiler or industrial furnace only as defined in VHWMR Part I?

YES NO

N/A

13.3.E.5.b

d. For marketers who accept shipments of hazardous waste fuel from other marketers, has the acceptor submitted the appropriate certification identified in c above?

YES NO

N/A

13.3.E.6.

e. In addition to any applicable generator or storer recordkeeping requirements, does the marketer keep

YES NO

N/A

copies of all certification notices he receives or sends for at least three years from the date of his last transaction with the person to whom the certification was made?

13.3.B.2	8. For burners (recyclers):	YES NO N/A
	a. Is the hazardous waste fuel burned only in an industrial furnace, industrial boiler or utility boiler as defined in VHWMR Part I? Identify:	

13.3.F.2	b. Has the burner filed the appropriate Notification of Hazardous Waste Activity for his burning activities and received an EPA Identification Number?	YES NO N/A
13.3.F.3.a	c. For short term accumulation by generators who burn their hazardous waste fuel on site, are the applicable accumulation provisions of VHWMR Section 6.4.E. being met (see generator checklist)?	YES NO N/A
13.3.F.3.b 13.3.F.3.c	d. For existing or new storage facilities who burn their hazardous waste fuel on site, are the applicable storage provisions of VHWMR Sections 9. through 9.11. or 10. through 10.11. respectively being met?	YES NO N/A
13.3.F.4	e. Before the burner accepts his first shipment of hazardous waste fuel from a marketer, has he provided the marketer with a one-time written and signed notice certifying that he has completed a Notification of Hazardous Waste Activity and obtained an EPA Identification Number, and that he will burn the hazardous waste fuel only in a boiler or industrial furnace?	YES NO N/A
13.3.F.5.	f. In addition to any applicable generator or storer recordkeeping requirements, does the burner keep copies of all certification notices he sends for at least three years from the	YES NO N/A

date of his last transaction with the person to whom the certification was made?

13.3.C.

9. For generators of hazardous waste fuel: generators of hazardous waste fuel are subject to VHWMR Parts V and VI. Complete Generator Checklist.

10. If the generator makes the claim that this is legitimate hazardous waste fuel, how is this done? _____

Identify Waste: _____

BTU value: _____

For facilities who answered "Yes" to question 2, complete questions 11 through 14:

11. Does the facility:

a) generate b) market c) burn

used oil burned for energy recovery? (circle one)

12. Has the inspector determined that the used oil is not mixed with hazardous waste? If not, do so.

13.4.A.2.

Has the generator mixed hazardous waste with his used oil?

YES NO

If yes, explain: _____

(Complete the hazardous waste fuel section of the checklist if the used oil is burned for energy recovery.)

13.4.B.1.a

13. For marketers of used oil fuel:

	a. Does the person market used oil fuel only to burners or other marketers who have completed a Notification of Hazardous Waste Activity and received an EPA Identification Number, and who burn the fuel in boilers, industrial furnaces or used oil-fired space heaters as defined in VHWMR Part I?	YES	NO
		N/A	
13.4.D.2.e	b. For marketers who ship used oil fuel to a burner or another marketer, has the marketer first obtained a one time written and signed notice from the burner or marketer certifying that the burner or marketer has completed a Notification of Hazardous Waste Activity, and if the recipient is a burner, that the used oil fuel will be burned in a boiler or industrial furnace only?	YES	NO
		N/A	
13.4.D.2.e	c. For marketers who accept shipments of used oil fuel from other marketers, has the acceptor submitted the appropriate certification identified in c above?	YES	NO
		N/A	
13.4.D.2.f	d. In addition to any applicable generator or storer recordkeeping requirements, does the marketer keep copies of all certification notices he receives or sends for at least three years from the date of his last transaction with the person to whom the certification was made?	YES	NO
		N/A	
13.4.D.2.a	e. Has the marketer obtained analyses or other information documenting that the used oil fuel does not exceed the maximum levels allowed in question 2?	YES	NO
		N/A	
13.4.D.2.c	f. Has the marketer completed a Notification of Hazardous Waste Activity and obtained an EPA Identification Number?	YES	NO
		N/A	
13.4.D.2.d	g. For each shipment of off-specification used oil to be burned for energy recovery initiated by the marketer, has the marketer prepared and sent an invoice to the receiving facility?	YES	NO
		N/A	

If yes, did the invoice contain the following information?

- | | | |
|---|-----|----|
| 1. An invoice number; | YES | NO |
| | N/A | |
| 2. His own EPA Identification number and the identification number of the receiving facility? | YES | NO |
| | N/A | |
| 3. The names and addresses of the shipping and receiving facilities? | YES | NO |
| | N/A | |
| 4. The quantity of off-specification used oil to be delivered? | YES | NO |
| | N/A | |
| 5. The date of shipment or delivery? | YES | NO |
| | N/A | |
| 6. The following statement; "This used oil is subject to EPA regulation under 40 CFR Part 266." | YES | NO |
| | N/A | |

13.4.D.2.f

h. Does the marketer keep copies of the following records for at least three years:

- | | | |
|--|-----|----|
| 1. Copies of analysis for used oil which he claims meets specifications? | YES | NO |
| | N/A | |
| 2. An operating log containing the following information for each shipment of used oil fuel that meets specification: Name and address of the receiving facility; the quantity of used oil fuel delivered; date of shipment or delivery; and a cross-reference to the record of used oil analysis? | YES | NO |
| | N/A | |
| 3. For each shipment of off-specification used oil fuel initiated, a copy of each invoice? | YES | NO |
| | N/A | |

14. For burners (recyclers) of used oil fuel:

13.4.E.2

- | | | |
|--|-----|----|
| a. Has the burner filed the appropriate Notification of Hazardous Waste Activity for his burning | YES | NO |
| | N/A | |

activities and received an EPA Identification Number?

- | | | | |
|-----------|--|-----|----|
| 13.4.E.3 | b. Prior to accepting the first shipment of off-specification used oil fuel from a marketer, did the burner provide each marketer with a one-time written and signed notice certifying that he has completed a Notification of Hazardous Waste Activity and received an EPA ID Number, and that he will burn used oil only in an industrial furnace or boiler? | YES | NO |
| | | N/A | |
| 13.4.E.5. | c. Has the burner kept a copy of each of the following for at least three years: | | |
| | 1. Each invoice he has received? | YES | NO |
| | | N/A | |
| | 2. Copies of each analysis of used oil fuel? | YES | NO |
| | | N/A | |
| | 3. A copy of each certification notice that he sends to a marketer? | YES | NO |
| | | N/A | |

For facilities who answered "Yes" to question 3, complete questions 15 through 16:

- | | | | |
|------------|---|------------|----|
| 13.5.B.1. | 15. Have persons who <u>generate</u> , transport or <u>store</u> recyclable materials used for precious metal recovery met the following requirements: | | |
| 13.5.B.1.a | a. Notification requirements of VHWMR Part IV? | <u>YES</u> | NO |
| 13.5.B.1.a | b. Manifest requirements of VHWMR Part V? | <u>YES</u> | NO |
| | c. Has the storer of recyclable materials verified that the transporter has a valid Virginia hazardous waste transporter permit? | <u>YES</u> | NO |
| 13.5.B.1.b | d. For transporters, obtained a transporter permit in accordance with VHWMR Section 7.3, and used a manifest system in accordance with VHWMR Section 7.5? | YES | NO |
| | | N/A | |

13.5.B.1.b

e. For storers, have they followed the appropriate manifesting and recordkeeping requirements of VHWMR Section 9.4?

YES NO

13.5.B.2

16. For persons who store recyclable materials, have the following records been kept to document that they are not accumulating these materials speculatively:

a. Records showing the volume of these materials stored at the beginning of the calendar year; and

YES NO

b. The amount of these materials generated or received during the calendar year; and

YES NO

c. The amount of materials remaining at the end of the calendar year?

☒ YES ☐ NO

d. Has the storer turned over at least 75% of his stored recyclable materials in the preceding calendar year?

☒ YES ☐ NO

For facilities who answered "Yes" to number 4:

13.6.B.

17. For facilities who store spent lead-acid batteries before reclaiming them:

13.6.B.1.

a. Has the facility filed a Notification

YES NO
N/A

13.6.B.3.

b. Has the facility complied with the appropriate sections of VHWMR Part X (except 10.1.C., 10.4.A., and 10.4.E.)?

YES NO
N/A

13.6.B.4.

c. Has the facility complied with all applicable provisions of VHWMR Parts XI and XII?

YES NO
N/A

18. Comments: _____

APRIL 1990

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF
LAND-RESTRICTED WASTE MANAGEMENT

Name of Facility: AMP Incorporated

Address: 1175 N. Main St.

Harrisonburg, VA 22801

EPA ID Number: VAD098444474

Facility Representative: John Rehm

Title: plant Manager

Telephone Number: (703) 433-3200

Inspector's Name: Cheryl Finley

Title: Environmental Engineer Sr.

Date of Inspection: _____

1. Does the facility generate, transport, or treat, store or dispose any land-restricted wastes? (See Attachment)

YES NO

If yes, please list:

F007, F003, F001, F006, D008, D002, D001
U122, D005, U024, P115

* Due to ongoing enforcement action against WRC, an issue regarding use of a waste pile at WRC remains unresolved.

15.1.A.3.

2. Is land disposal of wastes listed in 1 above occurring?

YES NO

If yes, then:

15.1.A.3.a.

a. Has the facility been granted an extension to the effective date for land restrictions applicable to its restricted waste? (See effective dates listed in Attachment)

YES NO
N/A

15.1.A.3.b.

b. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition?

YES NO
N/A

15.1.A.3.c.

c. Is the waste generated by small quantity generators of less than 220 pounds (100 kg) of hazardous waste, or 1 kg of acutely hazardous waste, per month?

YES NO
N/A

15.1.E.	d. Has the owner/operator submitted an application for a case-by-case extension to the effective date of any applicable restriction?	YES NO N/A
15.1.F.	e. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?	YES NO N/A
15.1.C.	3. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?	YES <input checked="" type="radio"/> NO
15.1.D.1.	4. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (If <u>no</u> , go to number 6) [If <u>yes</u> , complete surface impoundment checklist] [Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.] If <u>yes</u> , does the facility meet the following requirements:	YES <input checked="" type="radio"/> NO
15.1.D.1.b 15.1.G. 15.3.C. 15.4. 15.3.	a. Are the residues of the treatment analyzed as specified in VHWMR Sections 15.1.G. or 15.3.C. to determine if they meet the applicable treatment standards or VHWMR Section 15.4, or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR Section 15.3?	YES NO N/A
15.1.D.1.c. 9.10.B.1. 10.10.B.3.	b. Has the owner or operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liners?	YES NO N/A
15.1.D.1.c. 10.5.	c. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR Section 10.5.?	YES NO N/A

15.1.D.1.d.	d. Has the owner or operator submitted a written certification to the Executive Director that items a-c have been met which states, "I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted wastes. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."?	YES NO N/A
15.1.D.1.d.	e. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes accompanied by the above certification?	YES NO N/A
15.1.G.1.	6. Has the owner/operator determined if his waste is a land restricted waste?	<input checked="" type="radio"/> YES NO
15.1.G.1a.	7. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions? Did the notification include the following information:	YES <input checked="" type="radio"/> NO
15.1.G.1.b.1a	- EPA Hazardous Waste Number;	when accompanied <input checked="" type="radio"/> YES NO
15.1.G.1.b.1b	- The corresponding treatment standards and all applicable prohibitions set forth in VHWMR Section 15.3.C;	<input checked="" type="radio"/> YES NO
15.1.G.1.b.1c	- The manifest number associated with the shipment of waste;	<input checked="" type="radio"/> YES NO
15.1.G.1.b.1d	- Waste analysis data, where available?	<input checked="" type="radio"/> YES NO
15.1.G.1.b.	8. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR Section 15.3.C? a. Did the notification contain the following information:	YES NO N/A
15.1.G.1.b.1a	- EPA Hazardous Waste Number;	YES NO N/A

15.1.G.1.b.1b	- The corresponding treatment standards and all applicable prohibitions;	YES NO N/A
15.1.G.1.b.1c	- The manifest number associated with the shipment of waste; and	YES NO N/A
15.1.G.1.b.1d	- Waste analysis data, where available?	YES NO N/A
15.1.G.1.b.2.	<p>b. Was the certification signed by an authorized representative, and did it state the following:</p> <p>"I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR Section 15.4. and all applicable prohibitions set forth in VHWMR Section 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."</p>	YES NO N/A
15.1.G.1.c.	9. For restricted wastes which have received a case-by-case exemption, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded a notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?	YES NO N/A
15.1.G.f.	10. Does the generator retain on-site copies of all notices, certification, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?	<u>YES</u> NO
15.1.G.2.	11. <u>For Treatment Facilities ONLY:</u> Has the owner or operator of the treatment facility tested the treatment residues or extract to assure that they shall meet the applicable treatment standards?	YES NO N/A
15.1.G.2.	a. Has this testing been done at the frequency stated in the waste analysis plan?	YES NO N/A

15.1.G.2.a.	b. For treatment residuals which do not meet the applicable treatment standards, has the facility filed the notification in 8 above as a generator to any subsequent treatment facilities?	YES NO N/A
15.1.G.1.a.		

15.1.G.2.b.	c. For treated wastes meeting the applicable treatment standards, or for wastes not subject to any treatment standards, has a certification been signed and accompanies each shipment stating:	YES NO N/A
-------------	--	---------------

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in VHWMR Sections 15.4 and 15.3.C. without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

OR (for wastes with treatment standards expressed as technologies)

"I certify under penalty of law that the waste has been treated in accordance with the requirements of VHWMR Section 15.4.C. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

15.5.	12. Is the generator storing land restricted waste?	YES NO YES NO
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15.5.1.a.	a. If yes, is the storage onsite solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facility proper recovery, treatment or disposal?	YES NO YES NO
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Attachment - Land Restricted Wastes

<u>Waste</u>	<u>Effective Date</u>
F001 - F005	11/08/86
F001 - F005 from Small Quantity Generators	11/08/88
F001 - F005 generated via RCRA corrective actions or CERCLA response actions	11/08/88
Hazardous wastes containing less than 1% total F001 - F005 solvent constituents	11/08/88
F001 - F005 soil and debris resulting from RCRA corrective actions or CERCLA response actions	11/08/90
<hr/>	
Dioxin wastes F020 - F023, F026 - F028	11/08/88
F020 - F023, F026 - F028 soil and debris resulting from RCRA corrective actions or CERCLA response actions	11/08/90

California Listed Wastes

Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing free cyanides at concentrations greater than or equal to 1,000 ppm (mg/l). [Effective 7/8/87]

Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing any of the following metals or compounds of these metals at concentrations greater than or equal to those specified below:

Arsenic (as As)	500 mg/l
Cadmium (as Cd)	100 mg/l
Chromium (as Cr VI)	500 mg/l
Lead (as Pb)	500 mg/l
Mercury (as Hg)	20 mg/l
Nickel (as Ni)	134 mg/l
Selenium (as Se)	100 mg/l
Thallium (as Tl)	130 mg/l

Liquid hazardous wastes having a pH less than or equal to 2.0. [Effective 7/8/87]

Liquid hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. [Effective 7/8/87]

Liquid hazardous wastes, primarily water, containing greater than or equal to 1000 mg/l HOCs, but less than or equal to 10,000 mg/l HOCs. [Effective 7/8/87]

California waste contaminated soil and debris resulting from RCRA corrective actions or CERCLA response actions. [Effective 11/8/90]

Liquid hazardous wastes, not primarily water, containing greater

than or equal to 1000 mg/l HOCs. [Effective 11/8/88]

Nonliquid (non-RCRA/CERCLA) hazardous wastes containing greater than or equal to 1000 mg/l HOCs. [Effective 11/8/88]

Wastes to Be Evaluated By August 8/8/88 (First Third Wastes)

F006 - F009	P070	U108
F019	P071	U115
K001	P081	U122
K004	P082	U124
K008	P084	U129
K011	P087	U130
K013 - K018	P089	U133
K020	P092	U134
K021	P094	U137
K022	P097	U151
K024	P102	U154
K030	P105	U155
K031	P108	U157
K035	P110	U158
K036	P115	U159
K037	P120	U171
K044 - K052	P122	U177
K060	P123	U180
K061	U007	U185
K062	U009	U188
K069	U010	U192
K071	U012	U200
K073	U016	U209
K083 - K087	U018	U210
K099	U019	U211
K101 - K104	U022	U219
K106	U029	U220
P001	U031	U221
P004	U036	U223
P005	U037	U226
P010	U041	U227
P011	U043	U228
P012	U044	U237
P015	U046	U238
P016	U050	U248
P018	U051	U249
P020	U053	
P030	U061	
P036	U063	
P037	U064	
P039	U066	
P041	U067	
P048	U074	
P050	U077	
P058	U078	
P059	U086	
P063	U089	
P068	U103	
P069	U105	

WASTES TO BE EVALUATED BY JUNE 8, 1989 (Second Third Wastes)

F010	U002	U146
F011	U003	U147
F012	U005	U149
F024	U008	U150
K009	U011	U161
K010	U014	U162
K019	U015	U163
K025	U020	U164
K027	U021	U165
K028	U023	U168
K029	U025	U169
K038	U026	U170
K039	U028	U172
K040	U032	U173
K041	U035	U174
K042	U047	U176
K043	U049	U178
K095	U057	U179
K096	U058	U189
K097	U059	U193
K098	U060	U196
K105	U062	U203
P002	U070	U205
P003	U073	U206
P007	U080	U208
P008	U083	U213
P014	U092	U214
P026	U093	U215
P027	U094	U216
P029	U095	U217
P040	U097	U218
P043	U098	U235
P044	U099	U239
P049	U101	U244
P054	U106	
P057	U107	
P060	U109	
P062	U110	
P066	U111	
P067	U114	
P072	U116	
P074	U119	
P085	U127	
P098	U128	
P104	U131	
P106	U135	
P107	U138	
P111	U140	
P112	U142	
P113	U143	
P114	U144	

WASTES TO BE EVALUATED BY MAY 8, 1990 (THIRD THIRD WASTES)

K002	P109	U125
K003	P116	U126
K005	P118	U132
K006	P119	U136
K007	P121	U139
K023	U001	U141
K026	U004	U145
K032	U006	U148
K033	U017	U152
K034	U024	U153
K093	U027	U156
K094	U030	U160
K100	U033	U166
P006	U034	U167
P009	U038	U181
P013	U039	U182
P017	U042	U183
P021	U045	U184
P022	U048	U186
P023	U052	U187
P024	U055	U190
P028	U056	U191
P031	U068	U194
P033	U069	U197
P034	U071	U201
P038	U072	U202
P042	U075	U204
P045	U076	U207
P046	U079	U222
P047	U081	U225
P051	U082	U234
P056	U084	U236
P064	U085	U240
P065	U087	U243
P073	U088	U246
P075	U090	U247
P076	U091	
P077	U096	W a s t e s
P078	U102	identified as
P088	U112	being hazardous
P093	U113	based on a
P095	U117	characteristic
P096	U118	alone
P099	U120	
P101	U121	
P103	U123	

APRIL 1990

CHECKLIST FOR RCRA INSPECTION OF RECYCLABLE MATERIALS
(USED OIL, HAZARDOUS WASTE FUEL, AND PRECIOUS METALS)

Name of Facility: AMP Incorporated
Address: 1175 N. Main St.
Harrisonburg VA 22801
EPA ID Number: VAD098444474
Facility Representative: John Rehm
Title: Plant Manager
Telephone Number: (703) 433-3200
Inspector Name: Cheryl Finley
Title: Environmental Engineer Sr.
Date of Inspection: November 28, 1990

VHWMR Ref.

13.3.A.1. 1. Does the facility generate, transport, market or recycle hazardous wastes that are burned for energy recovery (hazardous waste fuel) in any boiler or industrial furnace that is not regulated as an incinerator? YES ☒ NO
Identify: _____

13.4.A.1 2. Does the facility generate, market or recycle used oil that is burned for energy recovery (used oil fuel) in any boiler or industrial furnace that is not regulated as an incinerator except used oil mixed with hazardous wastes? Identify: hydraulic oil to S-K fuel blending YES ☒ NO

(Note: Used oil burned for energy recovery is regulated as used oil fuel rather than hazardous waste fuel if it is a hazardous waste solely because it exhibits a characteristic of hazardous waste and is not mixed with a hazardous waste, or if it

contains hazardous waste generated by a conditionally exempt SQG, or if it exceeds the following maximum levels of hazardous constituents (off-specification used oil fuel):

Arsenic	5 ppm
Cadmium	2 ppm
Chromium	10 ppm
Lead	100 ppm
Flash point	100 F minimum
Total Halogens	4000 ppm *

* Used oil which contains greater than 1000 ppm total halogens is assumed to contain halogenated hazardous waste and therefore be regulated as hazardous waste fuel unless the company has shown that the used oil does not contain hazardous waste. For those wastes shown not to contain hazardous waste, the maximum allowable total halogen level is 4000 ppm.)

13.5.A
13.5.B

3. Does the facility generate, transport or store recyclable materials that are reclaimed to recover economically significant amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? ..

YES NO

13.6.B.

4. Does the facility store spent batteries before reclaiming them? [Note: Persons who generate, transport, or collect spent batteries, or who store spent batteries but don not reclaim them are not subject to VHWMR Parts IV through XIII.]

YES NO

For facilities who answered "Yes" to question 1, complete questions 5 through 10:

5. Does the facility:

a) generate b) transport c) market d) burn

hazardous waste fuel? (circle one) NO

[Note: If facility is a transporter, complete transporter checklist.]

6. For marketers of hazardous waste fuel:

a. For marketers who make the claim that the waste is legitimate hazardous waste fuel, how is this done? _____

Identify each waste stream (if more than one stream is mixed together, identify each stream separately): _____

BTU value of each stream: _____

7. For marketers of hazardous waste fuel:

13.3.B.1.a
13.3.E.2

a. Does the person market hazardous waste fuel only to those persons who have completed a Notification of Hazardous Waste Activity and received an EPA Identification Number, and who burn the fuel in boilers or industrial furnaces as defined in VHWMR Part I?

YES NO

N/A

13.3.E.3.

b. Are the provisions of VHWMR Sections 6.4.E, 9. through 9.11., 10. through 10.11. and Part XI being adhered to?

YES NO

N/A

13.3.E.5.a

c. For marketers who ship hazardous waste fuel to a burner or another marketer, has the marketer first obtained a one time written and signed notice from the burner or marketer certifying that the burner or marketer has completed a Notification of Hazardous Waste Activity, and if the recipient is a burner, that the hazardous waste fuel will be burned in a boiler or industrial furnace only as defined in VHWMR Part I?

YES NO

N/A

13.3.E.5.b

d. For marketers who accept shipments of hazardous waste fuel from other marketers, has the acceptor submitted the appropriate certification identified in c above?

YES NO

N/A

13.3.E.6.

e. In addition to any applicable generator or storer recordkeeping requirements, does the marketer keep

YES NO

N/A

copies of all certification notices he receives or sends for at least three years from the date of his last transaction with the person to whom the certification was made?

13.3.B.2	8. For burners (recyclers):	YES	NO
	a. Is the hazardous waste fuel burned only in an industrial furnace, industrial boiler or utility boiler as defined in VHWMR Part I? Identify:		N/A
13.3.F.2	b. Has the burner filed the appropriate Notification of Hazardous Waste Activity for his burning activities and received an EPA Identification Number?	YES	NO
			N/A
13.3.F.3.a	c. For short term accumulation by generators who burn their hazardous waste fuel on site, are the applicable accumulation provisions of VHWMR Section 6.4.E. being met (see generator checklist)?	YES	NO
			N/A
13.3.F.3.b	d. For existing or new storage facilities who burn their hazardous waste fuel on site, are the applicable storage provisions of VHWMR Sections 9. through 9.11. or 10. through 10.11. respectively being met?	YES	NO
13.3.F.3.c			N/A
13.3.F.4	e. Before the burner accepts his first shipment of hazardous waste fuel from a marketer, has he provided the marketer with a one-time written and signed notice certifying that he has completed a Notification of Hazardous Waste Activity and obtained an EPA Identification Number, and that he will burn the hazardous waste fuel only in a boiler or industrial furnace?	YES	NO
			N/A
13.3.F.5.	f. In addition to any applicable generator or storer recordkeeping requirements, does the burner keep copies of all certification notices he sends for at least three years from the	YES	NO
			N/A

date of his last transaction with the person to whom the certification was made?

13.3.C.

9. For generators of hazardous waste fuel: generators of hazardous waste fuel are subject to VHWMR Parts V and VI. Complete Generator Checklist.

10. If the generator makes the claim that this is legitimate hazardous waste fuel, how is this done? _____

Identify Waste: _____

BTU value: _____

For facilities who answered "Yes" to question 2, complete questions 11 through 14:

11. Does the facility:

a) generate b) market c) burn

used oil burned for energy recovery? (circle one)

12. Has the inspector determined that the used oil is not mixed with hazardous waste? If not, do so.

13.4.A.2.

Has the generator mixed hazardous waste with his used oil?

YES NO

If yes, explain: _____

(Complete the hazardous waste fuel section of the checklist if the used oil is burned for energy recovery.)

13.4.B.1.a

13. For marketers of used oil fuel:

	a. Does the person market used oil fuel only to burners or other marketers who have completed a Notification of Hazardous Waste Activity and received an EPA Identification Number, and who burn the fuel in boilers, industrial furnaces or used oil-fired space heaters as defined in VHWMR Part I?	YES	NO
		N/A	
13.4.D.2.e	b. For marketers who ship used oil fuel to a burner or another marketer, has the marketer first obtained a one time written and signed notice from the burner or marketer certifying that the burner or marketer has completed a Notification of Hazardous Waste Activity, and if the recipient is a burner, that the used oil fuel will be burned in a boiler or industrial furnace only?	YES	NO
		N/A	
13.4.D.2.e	c. For marketers who accept shipments of used oil fuel from other marketers, has the acceptor submitted the appropriate certification identified in c above?	YES	NO
		N/A	
13.4.D.2.f	d. In addition to any applicable generator or storer recordkeeping requirements, does the marketer keep copies of all certification notices he receives or sends for at least three years from the date of his last transaction with the person to whom the certification was made?	YES	NO
		N/A	
13.4.D.2.a	e. Has the marketer obtained analyses or other information documenting that the used oil fuel does not exceed the maximum levels allowed in question 2?	YES	NO
		N/A	
13.4.D.2.c	f. Has the marketer completed a Notification of Hazardous Waste Activity and obtained an EPA Identification Number?	YES	NO
		N/A	
13.4.D.2.d	g. For each shipment of off-specification used oil to be burned for energy recovery initiated by the marketer, has the marketer prepared and sent an invoice to the receiving facility?	YES	NO
		N/A	

If yes, did the invoice contain the following information?

- | | | |
|---|-----|----|
| 1. An invoice number; | YES | NO |
| | N/A | |
| 2. His own EPA Identification number and the identification number of the receiving facility? | YES | NO |
| | N/A | |
| 3. The names and addresses of the shipping and receiving facilities? | YES | NO |
| | N/A | |
| 4. The quantity of off-specification used oil to be delivered? | YES | NO |
| | N/A | |
| 5. The date of shipment or delivery? | YES | NO |
| | N/A | |
| 6. The following statement; "This used oil is subject to EPA regulation under 40 CFR Part 266." | YES | NO |
| | N/A | |

13.4.D.2.f

h. Does the marketer keep copies of the following records for at least three years:

- | | | |
|--|-----|----|
| 1. Copies of analysis for used oil which he claims meets specifications? | YES | NO |
| | N/A | |
| 2. An operating log containing the following information for each shipment of used oil fuel that meets specification: Name and address of the receiving facility; the quantity of used oil fuel delivered; date of shipment or delivery; and a cross-reference to the record of used oil analysis? | YES | NO |
| | N/A | |
| 3. For each shipment of off-specification used oil fuel initiated, a copy of each invoice? | YES | NO |
| | N/A | |

14. For burners (recyclers) of used oil fuel:

13.4.E.2

- | | | |
|--|-----|----|
| a. Has the burner filed the appropriate Notification of Hazardous Waste Activity for his burning | YES | NO |
| | N/A | |

activities and received an EPA Identification Number?

13.4.E.3

b. Prior to accepting the first shipment of off-specification used oil fuel from a marketer, did the burner provide each marketer with a one-time written and signed notice certifying that he has completed a Notification of Hazardous Waste Activity and received an EPA ID Number, and that he will burn used oil only in an industrial furnace or boiler?

YES NO

N/A

13.4.E.5.

c. Has the burner kept a copy of each of the following for at least three years:

1. Each invoice he has received?

YES NO

N/A

2. Copies of each analysis of used oil fuel?

YES NO

N/A

3. A copy of each certification notice that he sends to a marketer?

YES NO

N/A

For facilities who answered "Yes" to question 3, complete questions 15 through 16:

13.5.B.1.

15. Have persons who generate transport or store recyclable materials used for precious metal recovery met the following requirements:

13.5.B.1.a

a. Notification requirements of VHWMR Part IV?

YES NO

13.5.B.1.a

b. Manifest requirements of VHWMR Part V?

YES NO

c. Has the storer of recyclable materials verified that the transporter has a valid Virginia hazardous waste transporter permit?

YES NO

13.5.B.1.b

d. For transporters, obtained a transporter permit in accordance with VHWMR Section 7.3, and used a manifest system in accordance with VHWMR Section 7.5?

YES NO

N/A

13.5.B.1.b	e. For storers, have they followed the appropriate manifesting and recordkeeping requirements of VHWMR Section 9.4?	YES NO
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13.5.B.2	16. For persons who store recyclable materials, have the following records been kept to document that they are not accumulating these materials speculatively:	
	a. Records showing the volume of these materials stored at the beginning of the calendar year; and	YES NO
	b. The amount of these materials generated or received during the calendar year; and	YES NO
	c. The amount of materials remaining at the end of the calendar year?	YES NO
	d. Has the storer turned over at least 75% of his stored recyclable materials in the preceding calendar year?	YES NO

For facilities who answered "Yes" to number 4:

13.6.B.	17. For facilities who store spent lead-acid batteries before reclaiming them:	
13.6.B.1.	a. Has the facility filed a Notification	YES NO N/A
13.6.B.3.	b. Has the facility complied with the appropriate sections of VHWMR Part X (except 10.1.C., 10.4.A., and 10.4.E.)?	YES NO N/A
13.6.B.4.	c. Has the facility complied with all applicable provisions of VHWMR Parts XI and XII?	YES NO N/A

18. Comments: _____

APRIL 1990

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF
LAND-RESTRICTED WASTE MANAGEMENT

Name of Facility: AMP Incorporated
Address: 1175 N. Main St.
Harrisonburg VA 22801
EPA ID Number: VAD098444474
Facility Representative: John Rehm
Title: Plant Manager
Telephone Number: (703) 433-3200
Inspector's Name: Cheryl Finley
Title: Environmental Engineer Sr.
Date of Inspection: _____

1. Does the facility generate, transport, or treat, store or dispose any land-restricted wastes? (See Attachment)

☒ YES ☐ NO

If yes, please list:

F007, F003, F001, F006, D008, D002, D001
U122, D005, U024, P115

* Due to ongoing enforcement action against WRC, an issue regarding use of a waste pile at WRC remains unresolved.

15.1.A.3.

2. Is land disposal of wastes listed in 1 above occurring?

☒ YES ☐ NO

If yes, then:

15.1.A.3.a.

a. Has the facility been granted an extension to the effective date for land restrictions applicable to its restricted waste? (See effective dates listed in Attachment)

YES NO
N/A

15.1.A.3.b.

b. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition?

YES NO
N/A

15.1.A.3.c.

c. Is the waste generated by small quantity generators of less than 220 pounds (100 kg) of hazardous waste, or 1 kg of acutely hazardous waste, per month?

YES NO
N/A

15.1.E.	d. Has the owner/operator submitted an application for a case-by-case extension to the effective date of any applicable restriction?	YES NO N/A
15.1.F.	e. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?	YES NO N/A
15.1.C.	3. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?	YES (NO)
15.1.D.1.	4. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (If <u>no</u> , go to number 6) [If <u>yes</u> , complete surface impoundment checklist] [Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.] If <u>yes</u> , does the facility meet the following requirements:	YES (NO)
15.1.D.1.b 15.1.G. 15.3.C. 15.4. 15.3.	a. Are the residues of the treatment analyzed as specified in VHWMR Sections 15.1.G. or 15.3.C. to determine if they meet the applicable treatment standards or VHWMR Section 15.4, or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR Section 15.3?	YES NO N/A
15.1.D.1.c. 9.10.B.1. 10.10.B.3.	b. Has the owner or operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liners?	YES NO N/A
15.1.D.1.c. 10.5.	c. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR Section 10.5.?	YES NO N/A

15.1.D.1.d.	d. Has the owner or operator submitted a written certification to the Executive Director that items a-c have been met which states, "I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted wastes. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."?	YES NO N/A
15.1.D.1.d.	e. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes accompanied by the above certification?	YES NO N/A
15.1.G.1.	6. Has the owner/operator determined if his waste is a land restricted waste?	<input checked="" type="radio"/> YES NO
15.1.G.1a.	7. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions? Did the notification include the following information:	YES <input checked="" type="radio"/> NO
15.1.G.1.b.1a	- EPA Hazardous Waste Number;	<i>when accompanied</i> <input checked="" type="radio"/> YES NO
15.1.G.1.b.1b	- The corresponding treatment standards and all applicable prohibitions set forth in VHWMR Section 15.3.C;	<input checked="" type="radio"/> YES NO
15.1.G.1.b.1c	- The manifest number associated with the shipment of waste;	<input checked="" type="radio"/> YES NO
15.1.G.1.b.1d	- Waste analysis data, where available?	<input checked="" type="radio"/> YES NO
15.1.G.1.b.	8. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR Section 15.3.C? a. Did the notification contain the following information:	YES NO N/A
15.1.G.1.b.1a	- EPA Hazardous Waste Number;	YES NO N/A

15.1.G.1.b.1b	- The corresponding treatment standards and all applicable prohibitions;	YES NO N/A
15.1.G.1.b.1c	- The manifest number associated with the shipment of waste; and	YES NO N/A
15.1.G.1.b.1d	- Waste analysis data, where available?	YES NO N/A
15.1.G.1.b.2.	<p>b. Was the certification signed by an authorized representative, and did it state the following:</p> <p>"I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR Section 15.4. and all applicable prohibitions set forth in VHWMR Section 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."</p>	YES NO N/A
15.1.G.1.c.	9. For restricted wastes which have received a case-by-case exemption, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded a notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?	YES NO N/A
15.1.G.f.	10. Does the generator retain on-site copies of all notices, certification, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?	<u>YES</u> NO
15.1.G.2.	11. <u>For Treatment Facilities ONLY:</u> Has the owner or operator of the treatment facility tested the treatment residues or extract to assure that they shall meet the applicable treatment standards?	YES NO N/A
15.1.G.2.	a. Has this testing been done at the frequency stated in the waste analysis plan?	YES NO N/A

15.1.G.2.a.	b.	For treatment residuals which do not meet the applicable treatment standards, has the facility filed the notification in 8 above as a generator to any subsequent treatment facilities?	YES	NO
15.1.G.1.a.				N/A

15.1.G.2.b.	c.	For treated wastes meeting the applicable treatment standards, or for wastes not subject to any treatment standards, has a certification been signed and accompanies each shipment stating:	YES	NO
				N/A

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in VHWMR Sections 15.4 and 15.3.C. without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

OR (for wastes with treatment standards expressed as technologies)

"I certify under penalty of law that the waste has been treated in accordance with the requirements of VHWMR Section 15.4.C. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

15.5.	12.	Is the generator storing land restricted waste?	<input checked="" type="radio"/> YES	<input type="radio"/> NO
15.5.1.a.	a.	If yes, is the storage onsite solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facility proper recovery, treatment or disposal?	YES	<input checked="" type="radio"/> NO

Attachment - Land Restricted Wastes

<u>Waste</u>	<u>Effective Date</u>
F001 - F005	11/08/86
F001 - F005 from Small Quantity Generators	11/08/88
F001 - F005 generated via RCRA corrective actions or CERCLA response actions	11/08/88
Hazardous wastes containing less than 1% total F001 - F005 solvent constituents	11/08/88
F001 - F005 soil and debris resulting from RCRA corrective actions or CERCLA response actions	11/08/90
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Dioxin wastes F020 - F023, F026 - F028	11/08/88
F020 - F023, F026 - F028 soil and debris resulting from RCRA corrective actions or CERCLA response actions	11/08/90

California Listed Wastes

Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing free cyanides at concentrations greater than or equal to 1,000 ppm (mg/l). [Effective 7/8/87]

Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing any of the following metals or compounds of these metals at concentrations greater than or equal to those specified below:

Arsenic (as As)	500 mg/l
Cadmium (as Cd)	100 mg/l
Chromium (as Cr VI)	500 mg/l
Lead (as Pb)	500 mg/l
Mercury (as Hg)	20 mg/l
Nickel (as Ni)	134 mg/l
Selenium (as Se)	100 mg/l
Thallium (as Tl)	130 mg/l

Liquid hazardous wastes having a pH less than or equal to 2.0. [Effective 7/8/87]

Liquid hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. [Effective 7/8/87]

Liquid hazardous wastes, primarily water, containing greater than or equal to 1000 mg/l HOCs, but less than or equal to 10,000 mg/l HOCs. [Effective 7/8/87]

California waste contaminated soil and debris resulting from RCRA corrective actions or CERCLA response actions. [Effective 11/8/90]

Liquid hazardous wastes, not primarily water, containing greater

than or equal to 1000 mg/l HOCs. [Effective 11/8/88]

Nonliquid (non-RCRA/CERCLA) hazardous wastes containing greater than or equal to 1000 mg/l HOCs. [Effective 11/8/88]

Wastes to Be Evaluated By August 8/8/88 (First Third Wastes)

F006 - F009	P070	U108
F019	P071	U115
K001	P081	U122
K004	P082	U124
K008	P084	U129
K011	P087	U130
K013 - K018	P089	U133
K020	P092	U134
K021	P094	U137
K022	P097	U151
K024	P102	U154
K030	P105	U155
K031	P108	U157
K035	P110	U158
K036	P115	U159
K037	P120	U171
K044 - K052	P122	U177
K060	P123	U180
K061	U007	U185
K062	U009	U188
K069	U010	U192
K071	U012	U200
K073	U016	U209
K083 - K087	U018	U210
K099	U019	U211
K101 - K104	U022	U219
K106	U029	U220
P001	U031	U221
P004	U036	U223
P005	U037	U226
P010	U041	U227
P011	U043	U228
P012	U044	U237
P015	U046	U238
P016	U050	U248
P018	U051	U249
P020	U053	
P030	U061	
P036	U063	
P037	U064	
P039	U066	
P041	U067	
P048	U074	
P050	U077	
P058	U078	
P059	U086	
P063	U089	
P068	U103	
P069	U105	

WASTES TO BE EVALUATED BY JUNE 8, 1989 (Second Third Wastes)

F010	U002	U146
F011	U003	U147
F012	U005	U149
F024	U008	U150
K009	U011	U161
K010	U014	U162
K019	U015	U163
K025	U020	U164
K027	U021	U165
K028	U023	U168
K029	U025	U169
K038	U026	U170
K039	U028	U172
K040	U032	U173
K041	U035	U174
K042	U047	U176
K043	U049	U178
K095	U057	U179
K096	U058	U189
K097	U059	U193
K098	U060	U196
K105	U062	U203
P002	U070	U205
P003	U073	U206
P007	U080	U208
P008	U083	U213
P014	U092	U214
P026	U093	U215
P027	U094	U216
P029	U095	U217
P040	U097	U218
P043	U098	U235
P044	U099	U239
P049	U101	U244
P054	U106	
P057	U107	
P060	U109	
P062	U110	
P066	U111	
P067	U114	
P072	U116	
P074	U119	
P085	U127	
P098	U128	
P104	U131	
P106	U135	
P107	U138	
P111	U140	
P112	U142	
P113	U143	
P114	U144	

WASTES TO BE EVALUATED BY MAY 8, 1990 (THIRD THIRD WASTES)

K002	P109	U125
K003	P116	U126
K005	P118	U132
K006	P119	U136
K007	P121	U139
K023	U001	U141
K026	U004	U145
K032	U006	U148
K033	U017	U152
K034	U024	U153
K093	U027	U156
K094	U030	U160
K100	U033	U166
P006	U034	U167
P009	U038	U181
P013	U039	U182
P017	U042	U183
P021	U045	U184
P022	U048	U186
P023	U052	U187
P024	U055	U190
P028	U056	U191
P031	U068	U194
P033	U069	U197
P034	U071	U201
P038	U072	U202
P042	U075	U204
P045	U076	U207
P046	U079	U222
P047	U081	U225
P051	U082	U234
P056	U084	U236
P064	U085	U240
P065	U087	U243
P073	U088	U246
P075	U090	U247
P076	U091	
P077	U096	W a s t e s
P078	U102	identified as
P088	U112	being hazardous
P093	U113	based on a
P095	U117	characteristic
P096	U118	alone
P099	U120	
P101	U121	
P103	U123	